

1 A. I know which property they occurred on, yes.

2 MS. PETTY: I have no further questions.

3 ADMINISTRATIVE LAW JUDGE: Okay. Anything  
4 else?

5 MR. MILLER: Yes.

6 REDIRECT EXAMINATION

7 BY MR. MILLER:

8 Q. And which property did the camp meetings  
9 occur on?

10 A. They occurred in the school  
11 gymnasium/auditorium, as well as the church.

12 MR. MILLER: Okay. Thank you.

13 No further questions.

14 MS. PETTY: That's fine.

15 ADMINISTRATIVE LAW JUDGE: Okay.

16 (The Witness was sworn  
17 by the ALJ.)

18 MOLLIE STEENSON

19 called as a witness herein, at the instance of the  
20 Applicant, having been first duly sworn on her oath,  
21 was examined and testified as follows:

22 DIRECT EXAMINATION

23 BY MR. MILLER:

24 Q. Good morning, Mrs. Steenson. It's nice to

1 see you this morning.

2 A. Thank you.

3 Q. And can you tell us your full name and  
4 address for the record, please?

5 A. Mollie Steenson, 400 East Ninth, Johnston  
6 City, Illinois.

7 Q. Who is your current employer, Ms. Steenson?

8 A. Three Angels Broadcasting Network.

9 Q. And what is your current position?

10 A. Department Coordinator.

11 Q. And can you briefly describe what that  
12 position involves?

13 A. For the departments that answers directly to  
14 Danny Shelton, they -- I coordinate their needs to meet  
15 with him and the areas that, you know, relate directly  
16 with him. I'm a coordinator.

17 Q. And what would those departments be?

18 A. The department that I work with directly is  
19 the Call Center, Marketing, Pastoral, Construction, and  
20 Accounting, and Master Control.

21 Q. And what did you do before you came to --  
22 maybe I can ask you, how long have you been at Three  
23 Angels?

24 A. Seven years.

1 Q. And did you -- what position did you hold in  
2 the year 2000 and 2001?

3 A. Assistant to the President and Office  
4 Manager.

5 Q. And did you oversee these similar operations  
6 at that time?

7 A. All of the departments that answer directly  
8 to Danny, they would have come to me for appointments  
9 and so forth, but I have now more of an administrative  
10 role where they're concerned.

11 Q. What did you do before you came to Three  
12 Angels?

13 A. I was an associate pastor at Praise World  
14 Outreach.

15 Q. Were you an ordained minister?

16 A. Yes.

17 Q. Do you still, and did you in 2000 and 2001  
18 still carry out ministerial activities?

19 A. Yes.

20 Q. What were those activities?

21 A. I fill the pulpit periodically and I teach  
22 and I conduct worship services.

23 Q. And do you conduct worship services at Three  
24 Angels Broadcasting?

1 A. The morning worship services, yes.

2 Q. Is it at the main headquarters facility?

3 A. Yes.

4 Q. How frequently are there worship services  
5 there?

6 A. Every day.

7 Q. And how frequently do you lead worship  
8 services?

9 A. Oh, I would estimate four or five times a  
10 year. Although the worship service that's every Monday  
11 morning, I have the oversight of that. Although I  
12 don't always lead out in the worship service on Monday  
13 morning, I do make sure that someone is scheduled to  
14 have that responsibility.

15 Q. Is the Monday morning service different in  
16 some way?

17 A. The Monday morning worship service, every  
18 employee is invited to it. It's in the production  
19 facility.

20 Whereas on a daily basis, each department has  
21 worship throughout the ministry.

22 Q. Now, do you yourself appear on the Three  
23 Angels Broadcasting broadcast?

24 A. Yes, I do.

1 Q. And what do you do?

2 A. I have a 15 minute program.

3 Q. What does it consist of?

4 A. I read the bible. His Words are Live is the  
5 name of the program and I read the bible on that.

6 Q. Just read through the bible, is that right?

7 A. Yes.

8 Q. With any commentary?

9 A. Some at the beginning, some at the end, but  
10 basically it's just reading the scripture.

11 Q. And how frequently does it appear on Three  
12 Angels?

13 A. Currently it is appearing twice a week.

14 Q. Did you do this during 2000 and 2001?

15 A. Yes.

16 Q. Does Three Angels provide sabbath morning  
17 services every sabbath morning to your knowledge?

18 A. Yes, yes.

19 Q. How so?

20 A. On Three ABN we have programming on sabbath  
21 morning and that programming was taped prior to sabbath  
22 morning.

23 Q. And where was it taped?

24 A. In the production facility.

1 Q. And when is it actually broadcast?

2 A. Well, the programming that is produced in the  
3 production building is aired every day, but that  
4 includes sabbath as well.

5 Q. And do you know if some people watch that  
6 programming on Saturday mornings?

7 A. Yes. We get a lot of response from viewers  
8 that watch Three ABN programming.

9 MS. PETTY: Objection, foundation.

10 MR. MILLER: What form did these responses  
11 take?

12 THE WITNESS: Phone calls, letters, E-mails.

13 Q. And have you read these yourself?

14 A. Yes, I have, and personally people will, that  
15 I meet personally will give me that information as  
16 well.

17 Q. Okay. And what do these letters tell you  
18 about sabbath morning services?

19 A. A lot.

20 MS. PETTY: Objection, hearsay.

21 MR. MILLER: Your Honor, I believe it would  
22 fall under a state of mind exception to the hearsay  
23 rule, which shows that Three Angels purpose is to  
24 provide sabbath morning worship service in their view

1 is actually being fulfilled by the feedback that they  
2 receive and, therefore, they believe they're fulfilling  
3 and carrying out those purposes in good faith.

4 MS. PETTY: I don't think that falls under the  
5 exception at all. I think Mr. Miller has  
6 mischaracterized the state of mind exception to the  
7 hearsay rule.

8 ADMINISTRATIVE LAW JUDGE: I'm going to  
9 sustain the objection. I agree with your analysis,  
10 state of mind. If you want to --

11 MR. MILLER: Can you tell me why?

12 ADMINISTRATIVE LAW JUDGE: It doesn't fall  
13 under that exception.

14 MR. MILLER: As to the state of mind?

15 ADMINISTRATIVE LAW JUDGE: As to the state of  
16 mind.

17 MR. MILLER: Regarding their purpose?

18 ADMINISTRATIVE LAW JUDGE: I don't see the  
19 correlation.

20 MR. MILLER: Okay.

21 Let me ask you, Ms. Steenson, do you -- is  
22 one of the areas that you oversee the sales and  
23 distribution of videotapes?

24 THE WITNESS: I oversee the Call Center where

1 that is carried out.

2 Q. Where that takes place.

3 Do you know if Three Angels videotapes are  
4 copyrighted materials?

5 A. They are not.

6 Q. And what does this mean?

7 A. Well, quite often we get phone calls from  
8 people that want to make copies of the programming that  
9 they see on Three ABN, and actually both Danny and  
10 Linda quite often encourage the viewers to copy the  
11 programming they see on Three ABN as a witnessing tool,  
12 as an evangelistic tool, to share the programs of Three  
13 ABN that they copy in their home with their friends,  
14 with their relatives, to set up a church library.

15 Always encouraging the churches to set up a  
16 church library programming that they taped off of Three  
17 ABN. And so I'll get phone calls where the churches or  
18 the people will ask me if the material is copyrighted  
19 and can they do this, and I say, yes, please do. We  
20 encourage you to.

21 It's an excellent evangelistic tool.

22 Q. How has Three Angels affected your life?

23 MS. PETTY: Objection, Your Honor, relevancy.

24 MR. MILLER: It goes to the purposes of Three



1 ABN and whether they're actually -- whether their  
2 stated purposes and operations are actually having the  
3 affect that Three ABN is claiming they're having.

4 MS. PETTY: That's not one of the factors in  
5 the purpose of an organization, is whether they  
6 actually have the intended affect.

7 MR. MILLER: Your Honor, as I understand it  
8 they both have to do with purposes stated in the  
9 article, but you also have to look at the operations  
10 and the activities as to whether those purposes are  
11 being carried out.

12 And I would think the affects that these  
13 activities, involvement these people having in these  
14 activities would help determine that.

15 MS. PETTY: It's just an end round, end around  
16 the actual proving of the factor that they are  
17 following its stated purposes and objectives. It's  
18 irrelevant what affect it actually has on people who  
19 view the material.

20 MR. MILLER: I believe it would be evidence of  
21 all of that, Your Honor.

22 ADMINISTRATIVE LAW JUDGE: I'm going to  
23 overrule your objection and go ahead and allow the  
24 question.

1 THE WITNESS: Would you restate the question?

2 MR. MILLER: How has Three Angels organization  
3 affected your life?

4 A. Well, the heart of Three ABN is to mend  
5 broken people, and actually that's their theme song, I  
6 Want to Spend my Life Mending Broken People.

7 And seven years ago now, a little over seven  
8 years ago actually, I was a broken person and Three  
9 Angels Broadcasting Network, through Danny and Linda  
10 Shelton, reached out to me and in effect, I'm one of  
11 the people that have been mended through the ministry.

12 MR. MILLER: Thank you, Ms. Steenson. I have  
13 no further questions.

14 ADMINISTRATIVE LAW JUDGE: All right.

15 Ms. Petty?

16 CROSS EXAMINATION

17 BY MS. PETTY:

18 Q. Prior to joining --

19 ADMINISTRATIVE LAW JUDGE: This is Joanne  
20 Petty. She represents the Intervenors. I'll afford  
21 the same courtesy with your witnesses.

22 MS. PETTY: Prior to joining Three ABN you  
23 were associate pastor with Praise World Outreach,  
24 correct?

1 THE WITNESS: That is correct.

2 Q. And Praise World Outreach sold property to  
3 Three Angels Broadcasting, --

4 A. Yes, we did.

5 Q. -- is that correct?

6 And that property is located on Neil Road?

7 A. No.

8 Q. What is on the property that you, that Praise  
9 World Outreach sold to Three ABN?

10 A. A downlink tower.

11 Q. Is that where Master Control is for Three  
12 ABN?

13 A. No.

14 Q. Now, you also sold property to Three Angels  
15 Broadcasting, correct, prior to joining Three ABN?

16 A. No.

17 MR. MILLER: Objection. This is certainly  
18 beyond the scope of the direct examination, and I'm not  
19 sure I see any relevancy to the property at issue.

20 MS. PETTY: We had a 237 request. I'm just  
21 trying to save us some time. If counsel would give me  
22 some latitude on scope. I would have been entitled to  
23 call her in my case. I'm just trying to save all of us  
24 some time in not having to recall this witness.

1 MR. MILLER: I'll give her some latitude at  
2 this point.

3 ADMINISTRATIVE LAW JUDGE: Okay.

4 MS. PETTY: Now, you said you have oversight  
5 responsibilities for accounting?

6 THE WITNESS: Yes.

7 Q. You have actually no direct involvement in  
8 the actual accounting or preparing of financial reports  
9 of Three ABN, is that correct?

10 A. That is correct.

11 Q. Now, these worship services you discussed,  
12 they're approximately 15 to 20 minutes long?

13 A. Yes.

14 Q. And they are for the employees of Three ABN?

15 A. Yes.

16 Q. Are any members of the community invited or  
17 encouraged to attend these worship services?

18 A. No.

19 MR. MILLER: Objection, relevance.

20 MS. PETTY: It goes to whether or not it's  
21 being available, made available to members of the  
22 community, whether all of the services provided by  
23 Three ABN are easily accessible by members of the  
24 community.

1 ADMINISTRATIVE LAW JUDGE: I'm going to  
2 overrule your objection.

3 THE WITNESS: Ask your question again then.

4 MS. PETTY: You answered the question.

5 ADMINISTRATIVE LAW JUDGE: I think you already  
6 answered it.

7 MS. PETTY: Aside from the worship services  
8 you perform, there are no other activities that you  
9 actually perform as an ordained minister at the Three  
10 ABN production center, is that correct?

11 THE WITNESS: Yes.

12 Q. You have no responsibility with respect to  
13 the records or record keeping for Three ABN, true?

14 A. True.

15 Q. In fact, you have no documents in your  
16 possession?

17 A. No.

18 Q. You have no knowledge or information  
19 regarding how giveaways are determined, correct?

20 A. Correct.

21 Q. You have no knowledge as to how prices for  
22 the items for sale in their catalogs were determined,  
23 correct?

24 A. Correct.

1 Q. You have no responsibility for what goes in  
2 the catalog, correct?

3 A. Correct.

4 Q. Now, you also said that you encourage your  
5 viewers to copy your tapes?

6 A. Yes.

7 Q. But you do not provide or Three ABN does not  
8 provide free copies of the tapes that are all for sale  
9 in their catalog, isn't that true?

10 A. Occasionally tapes are given away free.

11 Q. But for the most part the general policy is  
12 that items for sale in their catalog are not freely  
13 given away for free?

14 A. That is correct.

15 Q. Now, you also oversee the Call Center?

16 A. That's one of the areas that I'm responsible  
17 for, yes.

18 Q. And you said you oversee Master Control?

19 A. Yes.

20 Q. Now, I asked you this earlier, and I just  
21 want to clarify.

22 Master Control is in the uplink building?

23 MR. MILLER: Objection, Your Honor. I think  
24 that's vague and confusing.

1 MS. PETTY: It's is kind of, I'm sorry.

2 MR. MILLER: I don't think she's established  
3 as to what the Uplink Center is.

4 ADMINISTRATIVE LAW JUDGE: I'm sorry, I don't  
5 know what the uplink building is, so I'm confused as  
6 well. So if you would like to lay some foundation or  
7 explain.

8 MS. PETTY: What is the uplink building?

9 THE WITNESS: The uplink building is the  
10 building that, where we uplink our signal to satellite.

11 Q. Where is that uplink building located?

12 A. Neil Davis Road.

13 Q. And give us an idea of where that is in  
14 relation to the production studio and the headquarters  
15 of Three Angels Broadcasting.

16 A. It's across town, and it's about two miles  
17 away.

18 Q. So does somebody actually have to take a tape  
19 and take it to Master Control to be uplinked to the  
20 satellite?

21 A. Yes.

22 Q. And is Master Control located in that uplink  
23 building?

24 A. Yes.

1 Q. Now, the reproduction of the videos that are  
2 for sale is also done in the Master Control building,  
3 correct?

4 A. To the best of my knowledge, yes.

5 Q. And the production of the music cassettes for  
6 sale are done outside the headquarter property of Three  
7 Angels Broadcasting, correct?

8 A. I'm not real familiar with that. I'm --  
9 they're -- some are done in our Call Center, but I  
10 don't know how many.

11 Q. Now, I just want to show you what's been  
12 previously admitted as Intervenor's Exhibit Number 6,  
13 which is the 2000 catalog.

14 Does that look familiar to you? I know it's  
15 just a copy.

16 A. Yes.

17 Q. Can you take a minute to flip through it to  
18 make sure?

19 A. Okay.

20 Q. I turn your attention to Page 24. I guess,  
21 there are lots of 24.

22 MR. MILLER: Is it Bates stamped?

23 MS. PETTY: Well, if you look under the  
24 heading of worship services.



1 MR. MILLER: Is there a bates number that  
2 you're looking at?

3 MS. PETTY: I just --

4 ADMINISTRATIVE LAW JUDGE: Here, do you want  
5 to use this one?

6 MS. PETTY: No. I have it actually.

7 ADMINISTRATIVE LAW JUDGE: It's 24H, Bates  
8 Stamp 30099.

9 MS. PETTY: It's Bates Stamped 30099, 300099  
10 under the heading of worship services.

11 Now, you testified that you have some  
12 involvement in the preparation of these catalogs?

13 MR. MILLER: I believe that -- objection. I  
14 believe that mischaracterizes the witness's testimony.

15 MS. PETTY: I can rephrase the question.

16 ADMINISTRATIVE LAW JUDGE: Okay.

17 MS. PETTY: Do you have any involvement in any  
18 way in the preparation of these catalogs?

19 THE WITNESS: Not in the preparation of them.

20 Q. Do you proofread the catalogs?

21 A. Possibly. I don't proofread them all, but I  
22 have proofread quite a few of them.

23 Q. You are familiar with the catalogs though?

24 A. I'm familiar with this catalog.

1 Q. Okay. Now, under the heading of worship  
2 services you see there are several tapes for sale.

3 Now, these were taped at locations outside of  
4 Three Angels Broadcasting Network's production  
5 facilities, correct?

6 MR. MILLER: Objection. I think we need  
7 foundation here.

8 MS. PETTY: Well, she can look at it and tell  
9 us.

10 MR. MILLER: The document speaks for itself.  
11 You're asking the witness to testify about knowledge  
12 apart from the document I believe.

13 MS. PETTY: With respect to your review of the  
14 catalog --

15 ADMINISTRATIVE LAW JUDGE: I'm going to  
16 sustain the objection and if you'd like to rephrase  
17 your question.

18 MS. PETTY: Sorry.

19 From your review of this catalog on that page  
20 that we marked or identified, can you tell us whether  
21 or not these worship services were actually taped at  
22 Three Angels Broadcasting Network?

23 MR. MILLER: Well, I'll renew my objection,  
24 Your Honor. I mean, we're all looking at the catalog

1 and she's asking the witness what the catalog says.

2 ADMINISTRATIVE LAW JUDGE: I don't believe  
3 so. I think I'll direct the witness to answer the  
4 question because --

5 MR. MILLER: Then I'm confused about what the  
6 catalog relates to.

7 Why not ask if certain programs were taped at  
8 Three ABN or not?

9 MS. PETTY: I can ask it that way. I really  
10 don't understand the legal basis for the objection  
11 but.

12 ADMINISTRATIVE LAW JUDGE: Okay.

13 MS. PETTY: Were -- I'll ask you this.

14 To your knowledge, are all programs aired on  
15 Three Angels Broadcasting Network taped and produced at  
16 Three Angels Broadcasting Network studios?

17 THE WITNESS: No.

18 Q. There are some worship services that are not  
19 taped or produced at Three Angels Broadcasting Network  
20 studios, correct?

21 A. That is correct.

22 Q. Now, one of those examples would be these  
23 worship services that are contained in this exhibit,  
24 true?

1 A. True.

2 Q. Now, these worship services that are taped  
3 outside of Three Angels Broadcasting Network studios  
4 and production facilities, are they then produced and  
5 packaged for sale by Three Angels Broadcasting  
6 Network?

7 THE WITNESS: Yes.

8 Excuse me, Judge, may I ask you a question?

9 MR. MILLER: Probably ask us, Mollie, but why  
10 don't we just wait?

11 MS. PETTY: Are you aware of any specific  
12 policy that authorizes call takers to provide materials  
13 free or at reduced cost for people who cannot afford  
14 them?

15 THE WITNESS: Anyone that would want, that  
16 would ask a call taker for materials at a reduced price  
17 or free would be referred to me.

18 Q. Okay. And that's because the call takers  
19 don't have the authority to make that decision,  
20 correct?

21 A. That is correct.

22 Q. The only person at the organization who has  
23 that authority is Danny Shelton, correct?

24 A. Ultimately, yes.

1 Q. The request goes to you?

2 A. Yes.

3 Q. And you direct that to Danny?

4 A. I'll take the request. Actually I screen it  
5 to some degree and if it's viable and worthy then I  
6 would go to Mr. Shelton.

7 Q. And what are the factors that you look at in  
8 determining what is a worthy and viable request?

9 A. Can I give you a for instance? Would that --

10 Q. Well --

11 A. Well, it would be if it's such a large  
12 request that it would be, you know, couldn't. If it's  
13 just for the ministry of the person to enhance or  
14 encourage the person or for the person to use for a  
15 small group then and they're unable or don't have the  
16 financial means to meet that need, then that's a viable  
17 worthy cause.

18 But if they're wanting, for instance, a lady  
19 recently asked for 200,000 books because she wanted to  
20 give one to every member of her community. To me that  
21 was excessive.

22 Q. So you screen those excessive calls and you  
23 don't take those to Danny?

24 A. The excessive calls, I wouldn't take an

1 excessive call to him.

2 Q. Now, are the people at the Call Center  
3 trained to take down the information such as what  
4 you've just described?

5 A. No, they would refer it to me.

6 Q. And then do you make follow-up calls to those  
7 people?

8 A. For the ones that we are going to give the  
9 material to, yes. I would call them and tell them that  
10 we are going to.

11 Q. For the years 2000 and 2001 how many of these  
12 calls did you take to Danny Shelton?

13 A. I don't know.

14 Q. Are you aware of whether or not Danny Shelton  
15 makes any follow-up determination regarding these  
16 reduced or free requests?

17 A. I don't understand your question.

18 Q. Do you know whether or not once you take the  
19 call or the request to Danny Shelton whether or not he  
20 makes further additional inquiry to make a  
21 determination?

22 A. I'm not aware of him doing that.

23 Q. Do you ever know what the resolution of the  
24 call or request is that you took to Mr. Shelton?

1 A. Yes, I would know that.

2 Q. Do you keep records as to that?

3 A. No.

4 Q. And you can't tell us how many of those  
5 requests were granted by Mr. Shelton in 2000 and 2001?

6 A. No.

7 Q. Do you know of any written policy by the  
8 Board of Directors giving Mr. Shelton guidance on how  
9 to give away things at reduced or free charges?

10 A. I'm not aware of any.

11 Q. You have no involvement in the satellite dish  
12 sales or the Sky Angel packages, is correct?

13 A. No.

14 Q. Your program that you read the bible, the 15  
15 minute program, do you know if those programs are for  
16 sale by Three Angels Broadcasting?

17 A. They are.

18 MS. PETTY: I have no further questions.

19 ADMINISTRATIVE LAW JUDGE: Any redirect?

20 MR. MILLER: I have nothing further for the  
21 witness, Your Honor.

22 ADMINISTRATIVE LAW JUDGE: Okay.

23 (The Witness was sworn

24 by the ALJ.)